

ESTTA Tracking number: **ESTTA436911**

Filing date: **10/20/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91201123
Party	Defendant Joma Publishing and Recording Company c/o Moses L. Johnson and Billy Madden
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Submission	Answer
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Date	10/20/2011
Attachments	ANSWER TO OPPOSITION.pdf ( 2 pages )(172698 bytes ) UNITED STATES PATENT AND TRADEMARK OFFICE cert.pdf ( 1 page )(124023 bytes )

UNITED STATES PATENT AND  
TRADEMARK OFFICE  
Trademark Trial and Appeal Board  
Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, VA 22313-1451

Mailed: October 20, 2011  
Opposition Number: 91201123  
Serial Number: 76706626

David A Bondy  
The Law Offices of David A Bondy PC  
200 12<sup>th</sup> Street  
Brooklyn, New York 11215 - United States

JOMA MUSIC GROUP, INC.

v.

JOMA PUBLISHING AND RECORDING  
COMPANY C/O MOSES L. JOHNSON AND  
BILLY MADDEN

Karen E. Haley  
KHaley & Associates, LLC  
36 Trumbull St., 1<sup>st</sup> Floor  
New Haven, CT 06511 - United States

**ANSWER TO OPPOSITION**

1. Deny. The mark is completely different in size, shape and color from the opponents and the company name is different.
2. Do not have sufficient knowledge and therefore leaves the opponent to his proof.  
  
JOMA Publishing and Recording Company, LLC is a music promotional company that promotes artists. The application was filed with the U.S. Patent and Trademark office prior in time to that of Joma Music Group, Inc. and was approved.

3. Deny. JOMA Publishing and Recording Company, LLC created and published CD's for one artist, The Anointed Sistas'-n-Christ, in November 2010 and the Trademark in question was created some time in 2010.
4. Deny. The services provided are significantly dissimilar in that one is an artist and one is a promoter. Deny sentence 2. The two marks are drastically dissimilar in size, shape and color and the company names are dissimilar so very little consumer confusion should result. Do not have sufficient knowledge and therefore leaves the opponent to his proof on sentence 3.

THE DEFENDANT

By: \_\_\_\_\_/Karen E. Haley/\_\_\_\_\_

Karen E. Haley  
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36 Trumbull St., 1<sup>st</sup> Floor  
New Haven, CT 06511  
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**CERTIFICATION OF SERVICE**

I hereby certify that a true and complete copy of the foregoing document has been served on Attorney David A. Bondy by mailing said copy on October 20, 2011, via First Class Mail, postage prepaid with delivery confirmation to: The Law Offices Of David A Bondy, PC, 200 12<sup>th</sup> Street, Brooklyn, New York 11215, United States.

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By: \_\_\_\_\_/Karen E. Haley/\_\_\_\_\_

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